



September 18, 2008  
Project No. 13636

Mr. J. Ryan Benefield, P.E.  
Chief, Hazardous Waste Division  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, Arkansas 72218

**Subject: Thirteenth Monthly Status Report (August 1<sup>st</sup> to 31<sup>st</sup>, 2008)  
Cedar Chemical Company Facility ("the Site")  
Helena-West Helena, Arkansas  
State EPA ID No. ARD990660649**

Dear Mr. Benefield:

On behalf of ExxonMobil Chemical Company, a Division of Exxon Mobil Corporation and Helena Chemical Company, which comprise the Cedar Chemical Site PRP Group ("the Group"), AMEC Geomatrix submits this letter constituting the Thirteenth Monthly Status Report (August 1<sup>st</sup> to 31<sup>st</sup>, 2008) summarizing our work efforts. This status report is being submitted under the scope of work and schedule presented to the Arkansas Department of Environmental Quality (ADEQ) on August 8, 2007. Summarized below are the activities completed in August, 2008 and the activities planned for the site in September, 2008.

### **Specific Work Completed in August 2008**

#### **General Site Activities**

- AMEC Geomatrix continued review of the data from Phase I of the Facility Investigation (FI) and began preparing for an internal technical meeting with the Group and the quarterly meeting with ADEQ.

#### **Site Investigation**

- On August 1, 2008, Ann Faitz requested copies of the analytical data results from the FI study.
- Kelly Beck contacted Tammie Hynum and Ryan Benefield to discuss the path forward for completing the data gaps. A removal action for the Drum Vault was also discussed during that call. Kelly Beck informed the ADEQ that a Supplemental Workplan for the additional well installations and the Drum Vault removal action would be submitted for ADEQ approval.
- On August 19, 2008, Kelly Beck on behalf of the Group requested an extension to submit the FI Workplan due to the additional work to be conducted to fill data gaps. Maps and

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tables that show the data and results through August, 2008 will be submitted to ADEQ by October 30, 2008. ADEQ verbally approved of this request.

- On August 20, 2008, AMEC Geomatrix sent Ann Faitz copies of the analytical data, well and boring logs and base maps requested from her on August 1, 2008.
- On August 25, 2008, Ann Faitz requested hard copy data packages from the laboratory, well construction logs and the CADD version of the basemaps prepared as work products by AMEC Geomatrix.
- On August 27, 2008, Kelly Beck contacted ADEQ with a new field schedule for the additional field work.
- On August 28, 2008, AMEC Geomatrix on behalf of the Group submitted the two workplans for the additional FI work and Drum Vault interim measure and the Request for Extension Letter to submit the FI Report.
- On August 29, 2008, ADEQ submitted to AMEC Gemoatrix the field support schedule for the additional work.

#### **Site Investigation Report**

- Following the completion of the site investigation, Geomatrix will submit the Site Investigation Report. ADEQ granted an extension to submit the report until January 31, 2009. Data tables and maps will be submitted to ADEQ on or before October 30, 2008.

#### **Feasibility Study**

- Within 60 days following ADEQ approval of the Site Investigation Report, Geomatrix will prepare and submit a Feasibility Study to identify a recommended site remedy.

#### **Work Planned for September 2008:**

##### **General Site Activities**

- **None Planned**

##### **Site Investigation**

- The second phase of the site investigation is set to begin on September 22, 2008.

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### **Site Investigation Report**

- No report activities are planned in September. Report activities will follow data gap analysis and a determination that site investigation activities are complete.

### **Feasibility Study**

- No feasibility study activities are planned in August. These activities will follow completion of the Site Investigation Report and approval by ADEQ.

### **Project Issues Pending:**

- IDW has been generated during the investigation that consists of soil and water. The waste was tested and waste profiles and manifests are being prepared for disposal of the waste. It is anticipated that the waste will be removed from the Site sometime during the week of September 22, 2008. Pursuant to discussions with ADEQ staff, the hazardous IDW will be manifested using the name and Hazardous Waste Identification Number originally assigned to the site under Cedar Chemical Corporation's tenure, but ExxonMobil and Helena Chemical Company will supply letters to ADEQ confirming that they are the entities responsible for arranging the disposal of the waste shipments in question.

### **Meetings and Conference Calls with ADEQ:**

- Telephone calls and electronic communication will occur as needed.

If you have any comments regarding this report, please call me at (512) 494-0333.

Sincerely,  
AMEC Geomatrix, Inc.

A handwritten signature in blue ink, appearing to read "Kelly Beck".

Kelly Beck, P.G.  
Project Manager

cc: ExxonMobil  
Helena Chemical Company  
Tyco Company Managers